

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JANE DOE 1, individually, and on behalf of all others similarly situated, JANE DOE 2, individually and on behalf of all others similarly situated, JANE DOE 3, individually and on behalf of all others similarly situated, JANE DOE 4, individually and on behalf of all others similarly situated and JANE DOE 5, individually and on behalf of all others similarly situated;

Plaintiffs,

vs.

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS, FIRST LADY CECILE DE JONGH, GOVERNOR KENNETH MAPP, SENATOR CELESTINO WHITE, ATTORNEY GENERAL VINCENT FRAZER, GOVERNOR JOHN DE JONGH, SENATOR CARLTON DOWE, DELEGATE STACEY PLASKETT, and JOHN DOES 1-100;

Defendants.

No.: 1:23-cv-10301-AS

**DEFENDANT GOV. JOHN DE
JONGH JR.'S NOTICE OF
JOINDER WITH /
INCORPORATION OF CO-
DEFENDANTS' MOTIONS**

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PLEASE TAKE NOTICE that, Defendant Governor John de Jongh [Jr.] (hereinafter “JdJ”) by and through undersigned counsel, hereby joins in the following recently-filed motions [ECF ## 121, 122, 124, 125, 126, 127, 128, 129] and incorporates all arguments applicable to JdJ raised therein, to the extent not already raised by JdJ’s Motion to Dismiss, Transfer, and/or Strike [ECF # 120], or to the extent such motions further brief and expand upon issues raised and grounds for dismissal/transfer raised by JdJ’s Motion [ECF #120], or to the extent defendants’ motions raise new grounds for dismissal or transfer that apply to JdJ. Defendant JdJ specifically joins in and incorporates the following motions, memoranda of law, and supporting papers:

ECF ## [121](#), [122](#)7/3/2024 Defendant Cecile de Jongh’s Motion to Dismiss,

Memorandum of Law, Affirmation, and supporting papers,

including, *but not limited to*, the argument of release (e.g., section IV(A)) and the arguments contained in section IV(B, D, E) of her Memorandum of Law (ECF # 121-[1](#)).


ECF ## [124](#), [125](#)7/3/2024, defendant Government of the Virgin Islands’ (“GVI”) Motion to Dismiss, Memorandum of Law in Support, and supporting papers, including, *but not limited to*, all immunity and VITCA arguments, and the GVI’s argument in section III(A) of its Memorandum of Law (ECF # [125](#), at 12-15).

ECF ## [126](#), [127](#), [128](#), [129](#)7/5/2024, defendant Stacey Plaskett’s Motion for Sanctions, Memorandum of Law in Support thereof, and supporting papers and evidence. While not a motion to dismiss, transfer or strike, to the extent Plaskett’s Motion for Sanctions raises issues relevant or applicable to JdJ’s motion to dismiss, JdJ joins and incorporates those issues and arguments, including, *but not limited to*, sections B(1-4) of Plaskett’s Memorandum of Law (ECF # [127](#)).

Defendant *respectfully* reserves the right to further join and incorporate future motions and arguments by co-defendants.

Dated: *July 8, 2024*
New York, New York




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AFFIRMATION OF SERVICE

I, Daniel L. Cevallos, Esq., declare under penalty of perjury that on the below date, I filed the foregoing via the Court's Electronic Case Filing system, which will send a Notice of Electronic Filing (NEF) to all those who have appeared of record on the NYSD ECF system.

Dated: *July 8, 2024*
New York, New York





Daniel L. Cevallos, Esq.

AFFIRMATION OF COMPLIANCE WITH PAGE LIMITS / FORMATTING

The undersigned hereby confirms that the within filing complies with Judge Subramanian's *Individual Practices in Civil Cases*, Rule 8(C) (3 pages, which is within the 20-page limit, excluding tables, captions, and signature lines) and Local Civil Rule 11.1.

Dated: *July 8, 2024*
New York, New York





Daniel L. Cevallos, Esq.